

1  
2  
3  
4  
5  
6 **UNITED STATES DISTRICT COURT**  
7 **WESTERN DISTRICT OF WASHINGTON**  
8 **AT SEATTLE**

9 FEDERAL TRADE COMMISSION, *et al.*,

10 Plaintiffs,

11 v.

12 AMAZON.COM, INC., a corporation,

13 Defendant.  
14

CASE NO. 2:23-cv-01495-JHC

**STIPULATED MOTION AND  
ORDER TO EXTEND THE  
DEADLINE FOR COURT-  
ORDERED RULE 30(b)(6)  
DEPOSITION**

NOTE ON MOTION CALENDAR:  
July 22, 2024

15  
16 The parties, by and through their attorneys of record, respectfully request that the Court  
17 enter the proposed order set forth below regarding a Fed. R. Civ. P. 30(b)(6) deposition ordered  
18 by the Court (Dkt. #238).

19 In support of this request, the parties represent the following to the Court:

- 20 1. On July 9, 2024, the Court ordered a Rule 30(b)(6) deposition of Defendant's  
21 representative on document retention "to take place within 30 days of this order."  
22 (Dkt. #238). At the deposition, "Plaintiffs may inquire into (1) when and to  
23 whom the litigation hold notices were given, (2) what kinds and categories of  
24

information and data Defendant's employees were instructed to preserve and collect, and (3) what specific actions they were instructed to take to that end." *Id*

2. The parties met and conferred about the Court's order. Amazon confirmed that it is preparing a representative to testify to the topics identified in the Court's order. Amazon also indicated that, due to previously scheduled travel, it would require a modest extension of the 30-day period contemplated by the Court's order.

3. Plaintiffs are amenable to the modest extension proposed by Amazon.

4. If acceptable to the Court, the parties have reached agreement to hold the deposition on August 21, 2024, in Washington, DC. This would result in the deposition taking place within 45 days of the Court's order.

5. The parties thus stipulate as follows, subject to Court approval, and jointly request that the Court enter the following Order approving this Stipulation:

a. The Rule 30(b)(6) deposition called for by the Court's July 9, 2024 Order shall take place on August 21, 2024 in Washington, DC.

Stipulated to and respectfully submitted this 22nd day of July, 2024, by:

**MORGAN, LEWIS & BOCKIUS LLP**

By: s/ Patty A. Eakes  
Patty A. Eakes, WSBA #18888  
Molly A. Terwilliger, WSBA #28449  
1301 Second Avenue, Suite 3000  
Seattle, WA 98101  
Phone: (206) 274-6400  
Email: patty.eakes@morganlewis.com  
molly.terwilliger@morganlewis.com

*Attorneys for Defendant Amazon.com, Inc.*  
**WILLIAMS & CONNOLLY LLP**

Heidi K. Hubbard (*pro hac vice*)  
John E. Schmittlein (*pro hac vice*)  
Kevin M. Hodges (*pro hac vice*)  
Jonathan B. Pitt (*pro hac vice*)  
Carl R. Metz (*pro hac vice*)  
Carol J. Pruski (*pro hac vice*)  
Katherine Trefz (*pro hac vice*)  
680 Maine Avenue SW  
Washington, DC 20024  
Phone: (202) 434-5000  
Email: hhubbard@wc.com  
khodges@wc.com  
jpitt@wc.com  
cmetz@wc.com  
cpruski@wc.com  
ktrefz@wc.com

**COVINGTON & BURLING LLP**

Thomas O. Barnett (*pro hac vice*)  
Derek Ludwin (*pro hac vice*)  
Kate Mitchell-Tombras (*pro hac vice*)  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001-4956  
Phone: (202) 662-5407  
Email: tbarnett@cov.com  
dludwin@cov.com  
kmitchelltombras@cov.com

**WILKINSON STEKLOFF LLP**

Kosta S. Stojilkovic (*pro hac vice*)  
2001 M Street NW, 10th Floor  
Washington, DC 20036  
Phone: (202) 847-4045  
Email: kstojilkovic@wilkinsonstekloff.com

*Attorneys for Defendant Amazon.com, Inc.*

s/ Edward H. Takashima

1 SUSAN A. MUSSER (DC Bar # 1531486)  
EDWARD H. TAKASHIMA (DC Bar #  
2 1001641)  
EMILY K. BOLLES (NY Reg. # 5408703)  
3 KARA KING (DC Bar # 90004509)  
ERIC ZEPP (NY Reg. #5538491)  
4 Federal Trade Commission  
600 Pennsylvania Avenue, NW  
5 Washington, DC 20580  
Tel.: (202) 326-2122 (Musser)  
6 (202) 326-2464 (Takashima)  
Email: smusser@ftc.gov  
7 etakashima@ftc.gov  
ebolles@ftc.gov  
8 kking@ftc.gov  
ezepp@ftc.gov  
9

10 *Attorneys for Plaintiff Federal Trade*  
*Commission*

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23 s/ Michael Jo  
Michael Jo (admitted *pro hac vice*)  
Assistant Attorney General, Antitrust Bureau  
24

New York State Office of the Attorney  
General  
28 Liberty Street  
New York, NY 10005  
Telephone: (212) 416-6537  
Email: Michael.Jo@ag.ny.gov  
*Counsel for Plaintiff State of New York*

s/ Rahul A. Darwar

Rahul A. Darwar (admitted *pro hac vice*)  
Assistant Attorney General  
Office of the Attorney General of Connecticut  
165 Capitol Avenue  
Hartford, CT 06016  
Telephone: (860) 808-5030  
Email: Rahul.Darwar@ct.gov  
*Counsel for Plaintiff State of Connecticut*

s/ Alexandra C. Sosnowski

Alexandra C. Sosnowski (admitted *pro hac vice*)  
Assistant Attorney General  
Consumer Protection and Antitrust Bureau  
New Hampshire Department of Justice  
Office of the Attorney General  
One Granite Place South  
Concord, NH 03301  
Telephone: (603) 271-2678  
Email: Alexandra.c.sosnowski@doj.nh.gov  
*Counsel for Plaintiff State of New Hampshire*

s/ Caleb J. Smith

Caleb J. Smith (admitted *pro hac vice*)  
Assistant Attorney General  
Consumer Protection Unit  
Office of the Oklahoma Attorney General  
15 West 6th Street, Suite 1000  
Tulsa, OK 74119  
Telephone: (918) 581-2230  
Email: caleb.smith@oag.ok.gov  
*Counsel for Plaintiff State of Oklahoma*

s/ Timothy D. Smith

Timothy D. Smith, WSBA No. 44583  
Senior Assistant Attorney General

Antitrust and False Claims Unit  
Oregon Department of Justice  
100 SW Market St  
Portland, OR 97201  
Telephone: (503) 934-4400  
Email: tim.smith@doj.state.or.us  
*Counsel for Plaintiff State of Oregon*

s/ Jennifer A. Thomson

Jennifer A. Thomson (admitted *pro hac vice*)  
Senior Deputy Attorney General  
Pennsylvania Office of Attorney General  
Strawberry Square, 14th Floor  
Harrisburg, PA 17120  
Telephone: (717) 787-4530  
Email: jthomson@attorneygeneral.gov  
*Counsel for Plaintiff Commonwealth of Pennsylvania*

s/ Michael A. Undorf

Michael A. Undorf (admitted *pro hac vice*)  
Deputy Attorney General  
Delaware Department of Justice  
820 N. French St., 5th Floor  
Wilmington, DE 19801  
Telephone: (302) 683-8816  
Email: michael.undorf@delaware.gov  
*Counsel for Plaintiff State of Delaware*

s/ Christina M. Moylan

Christina M. Moylan (admitted *pro hac vice*)  
Assistant Attorney General  
Chief, Consumer Protection Division  
Office of the Maine Attorney General  
6 State House Station  
Augusta, ME 04333-0006  
Telephone: (207) 626-8800  
Email: christina.moylan@maine.gov  
*Counsel for Plaintiff State of Maine*

s/ Gary Honick

Gary Honick (admitted *pro hac vice*)  
Assistant Attorney General

Deputy Chief, Antitrust Division  
Office of the Maryland Attorney General  
200 St. Paul Place  
Baltimore, MD 21202  
Telephone: (410) 576-6474  
Email: Ghonick@oag.state.md.us  
*Counsel for Plaintiff State of Maryland*

s/ Michael Mackenzie  
Michael Mackenzie (admitted *pro hac vice*)  
Deputy Chief, Antitrust Division  
Office of the Massachusetts Attorney General  
One Ashburton Place, 18th Floor  
Boston, MA 02108  
Telephone: (617) 963-2369  
Email: michael.mackenzie@mass.gov  
*Counsel for Plaintiff Commonwealth of Massachusetts*

s/ Scott A. Mertens  
Scott A. Mertens (admitted *pro hac vice*)  
Assistant Attorney General  
Michigan Department of Attorney General  
525 West Ottawa Street  
Lansing, MI 48933  
Telephone: (517) 335-7622  
Email: MertensS@michigan.gov  
*Counsel for Plaintiff State of Michigan*

s/ Zach Biesanz  
Zach Biesanz (admitted *pro hac vice*)  
Senior Enforcement Counsel  
Office of the Minnesota Attorney General  
445 Minnesota Street, Suite 1400  
Saint Paul, MN 55101  
Telephone: (651) 757-1257  
Email: zach.biesanz@ag.state.mn.us  
*Counsel for Plaintiff State of Minnesota*

s/ Lucas J. Tucker  
Lucas J. Tucker (admitted *pro hac vice*)  
Senior Deputy Attorney General

Office of the Nevada Attorney General  
100 N. Carson St.  
Carson City, NV 89701  
Telephone: (775) 684-1100  
Email: LTucker@ag.nv.gov  
*Counsel for Plaintiff State of Nevada*

s/ Ana Atta-Alla  
Ana Atta-Alla (admitted *pro hac vice*)  
Deputy Attorney General  
New Jersey Office of the Attorney General  
124 Halsey Street, 5th Floor  
Newark, NJ 07101  
Telephone: (973) 648-3070  
Email: Ana.Atta-Alla@law.njoag.gov  
*Counsel for Plaintiff State of New Jersey*

s/ Jeffrey Herrera  
Jeffrey Herrera (admitted *pro hac vice*)  
Assistant Attorney General  
New Mexico Office of the Attorney General  
408 Galisteo St.  
Santa Fe, NM 87501  
Telephone: (505) 490-4878  
Email: jherrera@nmag.gov  
*Counsel for Plaintiff State of New Mexico*

s/ Zulma Carrasquillo-Almena  
Zulma Carrasquillo (admitted *pro hac vice*)  
Assistant Attorney General  
Antitrust Division  
Puerto Rico Department of Justice  
P.O. Box 9020192  
San Juan, Puerto Rico 00901-0192  
Telephone: (787) 721-2900  
Email: zcarrasquillo@justicia.pr.gov  
*Counsel for Plaintiff Commonwealth of Puerto Rico*

s/ Stephen N. Provazza  
Stephen N. Provazza (admitted *pro hac vice*)  
Special Assistant Attorney General

1 Chief, Consumer and Economic Justice Unit  
Department of the Attorney General  
2 150 South Main Street  
Providence, RI 02903  
3 Telephone: (401) 274-4400  
Email: sprovazza@riag.ri.gov  
4

5 *Counsel for Plaintiff State of Rhode Island*

6 s/ Sarah L.J. Aceves

Sara L. J. Aceves (admitted *pro hac vice*)  
7 Assistant Attorney General  
Vermont Attorney General's Office  
8 109 State Street  
Montpelier, VT 05609  
9 Telephone: (802) 828-3170  
Email: sarah.aceves@vermont.gov

10 *Counsel for Plaintiff State of Vermont*

11 s/ Laura E. McFarlane

Laura E. McFarlane (admitted *pro hac vice*)  
12 Assistant Attorney General  
Wisconsin Department of Justice  
13 Post Office Box 7857  
Madison, WI 53707-7857  
14 Telephone: (608) 266-8911  
Email: mcfarlanele@doj.state.wi.us

15 *Counsel for Plaintiff State of Wisconsin*

**ORDER**

IT IS SO ORDERED.

DATED this 22nd day of July, 2024.

A handwritten signature in cursive script, reading "John H. Chun", is written over a horizontal line.

JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE